

EXHIBIT B-3

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

AL'S DISCOUNT PLUMBING;
ACCURATE BACKFLOW AND
PLUMBING SERVICES, INC.;
HOMESTEAD HEATING &
PLUMBING, LLC; AIRIC'S
HEATING & AIR CONDITIONING,
INC.; PRIME SOURCE PLUMBING
& HEATING CORP.; RYAN
PLUMBING, INC.; MAZZOLA
PLUMBING HEATING & GAS
FITTING, INC.; SOUTH SHORE
HEATING AND PLUMBING, INC.;
ALL KNIGHT PLUMBING,
HEATING AND AIR
CONDITIONING, INC.; PLUMB
PERFECTION, LLC, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF DANIEL C. HEDLUND IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AND
ATTORNEYS' FEES, EXPENSES AND SERVICE AWARDS**

I, Daniel C. Hedlund, hereby declare and state as follows:

1. I am a member of the law firm of Gustafson Gluek PLLC (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Awards. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiffs and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are Daniel C. Hedlund, Jason S. Kilene, Michelle J. Looby, Brittany N. Resch, Mickey L. Stevens, and Gabrielle O. Sliwka. Under the direction of Interim Class Counsel, the Firm undertook the following assignments:

- a. Work closely with clients to complete Plaintiff Questionnaires for class representatives Prime Source Plumbing & Heating Corp. ("Prime Source"), All Knight Plumbing, Heating and Air Conditioning Inc. ("All Knight"), and Plumb Perfection LLC ("Plumb Perfection") (collectively, "Clients");
- b. Collect and prepare Clients' document productions;
- c. Prepare discovery responses for Clients and discuss same with Clients;
- d. Prepare for and defend deposition of Prime Source;
- e. Initial deposition preparation with All Knight and Plumb Perfection clients; and
- f. Review and analyze documents produced by defendants.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at historical rates for these attorneys along with a collective entry for the Firm's paralegals:¹

<u>Attorney</u>	<u>Hours Billed</u>	<u>Amount</u>	<u>Hourly Rate</u>
Daniel C. Hedlund	26.00	24,050.00	925.00

¹ If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

	25.30	22,770.00	900.00
Jason S. Kilene	19.50	18,037.50	925.00
	51.40	46,260.00	900.00
Michelle J. Looby	0.90	607.50	675.00
	15.1	9,815.00	650.00
Brittany N. Resch	32.60	13,855.00	425.00
Mickey L. Stevens	30.30	11,302.50	375.00
	36.30	12,705.00	350.00
Gabrielle O. Sliwka	49.50	15,592.50	315.00
	1.30	390.00	300.00
Paralegal Work	38.10	5,790.00	
Total:	326.30	\$181,175.00	

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$1,313.18 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Copying, Printing and Scanning	\$60.90

Telephone and Conference Calls	\$9.84
Messenger and delivery services	\$53.65
Service of Process	
Carfare, Travel and Meals	\$1,105.19
Expert Fees	
Court Reporters and Transcripts	
Legal Research and Filing Fees	\$83.60
Mediators	

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November 10, 2020



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